

EXHIBIT B

WordPerfect Document Compare Summary

Original document: C:\Documents and Settings\hamilt\ Desktop\TrafficSchool.com v. Edriver Court's Original Proposed Judgment and Permanent Injunction.wpd

Revised document: C:\NetDocs\Echo\TrafficSchool.com v. Edriver Plaintiffs' Revised Proposed Judgment and Permanent Injunction.wpd

Deletions are shown with the following attributes and color:

~~Strikeout~~, Blue RGB(0,0,255).

Deleted text is shown as full text.

Insertions are shown with the following attributes and color:

Double Underline, Redline, Red RGB(255,0,0).

The document was marked with 5 Deletions, 22 Insertions, 0 Moves.

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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
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11 TRAFFICSCHOOL.COM, INC., a
12 California corporation; DRIVERS ED
13 DIRECT, LLC, a California limited liability
14 company,

15 Plaintiffs,

16 v.

17 EDRIVER, INC., ONLINE GURU, INC.,
18 FIND MY SPECIALIST, INC., and
19 SERIOUSNET, INC., California
20 corporations; RAVI K. LAHOTI, an
21 individual; RAJ LAHOTI, an individual;
22 DOES 1 through 10,

23 Defendants.
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CV 06-7561 PA (CWx)

**[PROPOSED] JUDGMENT AND
PERMANENT INJUNCTION**

29 The Court, pursuant to its Findings of Fact and Conclusions of Law and Order
30 Finding Defendants Liable for False Advertising, hereby ORDERS, ADJUDICATES AND
31 DECREES that final judgment, including a permanent injunction, shall be and hereby is
32 entered in the above entitled matter as follows:

33 1. The Defendants eDriver, Inc., Online Guru, Inc., Find My Specialist, Inc.,
34 Seriousnet, Inc., Ravi Lahoti, and Raj Lahoti, (collectively "Defendants"), their owners,
35 officers, directors, assignees, transferees, employees, agents and representatives, and all

1 other persons, firms or entities acting in concert or participating with them, who receive
2 notice of the injunction, are enjoined as follows:

3 (a) Defendants shall employ an acknowledgment page, or “splash screen,”
4 that every visitor upon every visit, to any entry webpage on the DMV.ORG domain and/or
5 website shall immediately see prior to any viewing of the webpage content, without the user
6 being able to view the DMV.ORG website in the background of the splash screen;

7 (b) Visitors to any webpage on the DMV.ORG domain and/or website
8 need only view the acknowledgment page once during each visit, and need not be presented
9 with the acknowledgment page again when navigating to different webpages within the
10 DMV.ORG domain and/or website upon the same visit;

11 (c) The acknowledgment page shall state, without any branding, additional
12 wording, or images, only the following text, in black font, bolded and underlined (where
13 noted) and in at least 14 point font, as follows: “You are about to enter a **privately owned,**
14 **for profit, website** that is **not** owned or operated by any state government agency.
15 To continue, click ‘continue’ below.” -Below this disclaimer shall be a ~~“click-through”~~ click-
16 through button labeled “continue”, which shall not be disproportionately larger than the other
17 text or the drop-down menu in (d) below, that the visitor must affirmatively click to continue
18 to the webpage on the DMV.ORG domain and/or website;

19 (d) Below the “continue” button, and appearing on all computer monitors
20 of common size without a visitor having to scroll down, shall be the statement: “If you
21 intended to visit your state’s DMV or motor vehicle regulating agency, choose your state
22 below to be redirected.”;

23 (e) Below this statement shall appear a drop-down menu, that also must
24 appear on all computer monitors of common size without a visitor having to scroll down, that
25 allows the visitor to choose their state. Upon choosing their state, the visitor shall be
26 immediately redirected (without any further messages, other advertisements or any other
27 communications by Defendants to the user who is being redirected) to their state’s official
28 Department of Motor Vehicles or equivalent ~~agency~~ agency’s homepage. Further, Defendants

1 shall not be permitted to collect any information (e.g., IP addresses or email addresses) from
2 any visitor who does not click the “continue” button, or to employ other technical means
3 (e.g., tracking cookies) to then solicit or otherwise contact such visitors.

4 (f) All fonts used on the acknowledgment page, including those in the
5 continue button and drop down menus shall be in black color and be of the same font type,
6 size and boldness, except for the emphasized boldness in (c) above.

7 (g) The following text shall appear on the acknowledgment page: “This
8 acknowledgment page is mandated by a Federal Court ruling.”

9 2. Plaintiffs shall recover their costs of suit.

10 IT IS SO ORDERED, ADJUDICATED AND DECREED.

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12 DATED: June ___, 2008

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14 Percy Anderson
15 UNITED STATES DISTRICT JUDGE
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